

**IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

STANLEY BLACK & DECKER, INC.

and THE BLACK & DECKER CORPORATION,

Plaintiffs,

v.

Case No.: 1:20-cv-06808

THE PARTNERSHIPS AND UNINCORPORATED

ASSOCIATIONS IDENTIFIED ON SCHEDULE “A”,

Defendants.

**Defendant’s Motion for
Extension of Time**

NOW COMES the Defendant, 1topmall (No. 42), (“Defendant”), by and through its undersigned counsel, and hereby moves this Court to extend the time to file a response to the Complaint. In support of its motion, the Defendant states as follows:

1. Plaintiff filed its Complaint on November 17, 2020. [Dkt. 1].
2. The Defendant was ostensibly served with process on December 3, 2020. [Dkt. 19].
3. The Defendant has been involved in settlement negotiations with Plaintiff.
4. Despite its diligence, the Defendant needs a short additional amount of time to settle, or exhaust the prospect of settlement and respond to Plaintiff’s Complaint.
5. The Defendant has not previously requested an extension.
6. This Court may, for good cause, extend the time by which Defendant’s response is due if a request is made, before the original time or its extension expires. Fed. R. Civ. P. 6(b)(1)(A).
7. The Defendant respectfully requests this Court extend the date on which Defendant is

to have filed response(s) to Plaintiff's Complaint, if ultimately necessary, to February 4, 2021.

8. This Motion has been filed in good faith and is not made for purposes of delay.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests that this Honorable Court enter an Order:

- a) Extending the date on which Defendant's response to Plaintiff's Complaint is due to February 4, 2021.

Dated: January 14, 2021

Respectfully submitted,

s/ Christopher Keleher

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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2021, I filed a copy of the foregoing Motion using the CM/ECF system, which will automatically send electronic notification of such filing to all attorneys of record.

s/ Christopher Keleher

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